

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

RETRACTABLE TECHNOLOGIES, INC. Plaintiff	
v.	02MC139
TECTON DICKINSON & COMPANY, et al. Defendants	

**PLAINTIFF-S UNCONTESTED MOTION FOR EXTENSION
OF TIME TO FILE A RESPONSE TO EMERGENCY CARE RESEARCH
INSTITUTE'S ("ECRI") MOTION TO QUASH
OR IN THE ALTERNATIVE FOR A PRTECTIVE ORDER**

Comes now Plaintiff Retractable Technologies, Inc. (ARTI@), and files this their Uncontested Motion for Extension of Time to File a Response to Emergency Care Research Institute's (referred to hereafter as "ECRI@) Motion to Quash or in the Alternative for Protective Order. Supporting this motion, Plaintiff respectfully shows this Honorable Court the following:

1. On or about May 28, 2002, ECRI filed with the Court it's Motion to Quash Pursuant to Fed.R.Civ.P. 45(c) or in the Alternative for a Protective Order Pursuant to Fed.R.Civ.P. 45(c) and 26. Pursuant to Local Rule 7.1(c), Plaintiff is required to file a response to ECRI's Motion to Quash or in the Alternative for Protective Order on or before Tuesday, June 11, 2002.
2. ECRI has agreed to allow Plaintiff Retractable Technologies, Inc. additional time in which to file its response to ECRI's Motion to Quash or in the Alternative for Protective Order. The parties have agreed to allow Retractable Technologies, Inc. an additional week from the deadline of June 11, 2002, in which to file a response. Said response shall now be due on or before Monday, June 17, 2002.

WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests that the Court enter an order granting it's Uncontested Motion for Extension of Time to File a Response to ECRI's Motion to Quash or in the Alternative for Protective Order. Plaintiff further prays for such other relief to which it may be justly entitled.

Respectfully submitted,

W. MARK LANIER
State Bar No.: 11934600
THE LANIER LAW FIRM
6810 FM 1960 West
Houston, Texas 77069
(713) 659-5200 (713) 659-2204 (fax)

ATTORNEYS FOR PLAINTIFF
RETRACTABLE TECHNOLOGIES, INC.

MOTION AGREED TO:

(*)
Richard J. Davies, Esquire
Attorney I.D. No. 46380
POWELL, TRACHTMAN, LOGAN,
CARRLE, BOWMAN & LOMBARDO, P.C.
475 Allendale Road, Suite 200
King of Prussia, PA 19406
(610) 354-9700 (610) 354-9760 (fax)

ATTORNEYS FOR MOVANT, "ECRI"
EMERGENCY CARE RESEARCH
INSTITUTE

(*) Signed for by permission

OF COUNSEL:

PATTON & TIDWELL, L.L.P.
4605 Texas Boulevard
P. O. Box 5398
Texarkana, Texas 75505-5398
(903) 792-7080 (903) 792-8233 (fax)

THE LANIER LAW FIRM
6810 FM 1960 West
Houston, Texas 77069
(713) 659-5200 (713) 659-2204 (fax)

O'QUINN, LAMINACK & PIRTLE
John M. O'Quinn SBN: 15296000
2300 Lyric Centre Building
440 Lyric Centre Building
Houston, Texas 77002
(713) 223-1000 (713) 222-6903 (fax)

MULLEN, HOARD, BROWN, LANGSTON,
CARR, HUNT & JOY, L.L.P.
Donald M. Hunt SBN: 10284000
1001 Texas Avenue
P.O. Box 2585
Lubbock, Texas 79408-2565
(806) 765-7491 (806) 765-0553 (fax)

CERTIFICATE OF SERVICE

I hereby certify that I have forward a true and correct copy of Plaintiff's Uncontested Motion for Extension of Time to File a Response to ECRI's Motion to Quash or in the Alternative Motion for Protection to the following counsel of record by U.S. mail, certified mail, return receipt requested, and/or facsimile transmission on this _____ day of June, 2002:

Mr. W. David Carter
Mercy, Carter & Elliot, L.L.P.
1730 Galleria Oaks Drive
Texarkana, Texas 75503

Mr. Leslie Gordon Fagen
Mr. Robert A. Atkins
Mr. Joseph J. Frank
Paul, Weiss, Rifkind, Wharton
& Garrison
1285 Avenue of the Americas
New York, New York 10019

Mr. David J. Beck
Mr. Alistair Dawson
Beck, Redden & Secrest, L.L.P.
4500 One Houston Center
1221 McKinney Street
Houston, Texas 77010-2010

Mr. Winford L. Dunn, Jr.
Dunn, Nutter & Morgan, L.L.P.
State Line Plaza, Box 8030
Texarkana, Arkansas 71854

Mr. Robert E. Bloch
Mr. Mitchell D. Raup
Mr. Gary A. Winters
Mayer, Brown, Rowe & Maw
1909 K. St., N.W.
Washington, D.C. 20006

Mr. J. Dennis Chambers
Atchley, Russell, Waldrop
& Hlavinka
P. O. Box 5517
1710 Moores Lane
Texarkana, Texas 75505

Mr. James K. Gardner
Neal, Gerber & Eisenberg
2 N. LaSalle St.
Suite 2200
Chicago, Illinois 60602

Mr. John L. Murchison, Jr.
Mr. John P. DeGeeter
Mr. Bruce A. Blefeld
Vinson & Elkins L.L.P.
2300 First City Tower
1001 Fannin
Houston, Texas 77002-6760

Mr. Damon Young
Young & Pickett
P. O. Box 1897
Texarkana, Arkansas/
Texas 75504

Ms. Ronnie Solomon
ECRI – General Counsel
5200 Butler Pike
Plymouth Meeting, PA
19468

Mr. Richard J. Davies
Powell, Trachtman, Logan,
Carlle, Bowman & Lombardo
475 Allendale Road
Suite 200
King of Prussia, PA 19406

W. Mark Lanier

